The BURKE-PARSONS-BOWLBY Corporation

P. O. BOX 86 • GOSHEN, VIRGINIA 24439 • PHONE: (540) 997-9251
FAX: (540) 997-0047

PRESSURE TREATED
WOOD PRODUCTS

March 21, 2005

Ms Jeanna R. Henry (3WC31)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia Pennsylvania 19103-2029

Re: Information Request EPA Reference No. CO5-007; EPA ID NO. VAD005027560

Dear Ms. Henry:

Pursuant to the above referenced information request from U.S.EPA Region III, received by Burke-Parsons-Bowlby Corporation (BPB) on February 18, 2005, BPB provides the following response .

Each question posed by EPA is reiterated and then followed by BPB's **"Response"**. Attachment A hereto provides the legal regulatory basis for the majority of the responses provided and is an integral part of said response.

If you have any questions regarding the information provided in the responses please contact Doug Gentry, Division Manager, BPB Corporation at 540 997-9251.

Sincerely,

Doug Gentry,
Division Manager
Burke-Parsons-Bowlby Corporation

RESPONSE TO QUESTION

1. With regard to the condensate generated during the creosote treatment process, please answer the following:

   a. Is condensate generated by each treatment cylinder (Cylinder Nos. 1, 2, 3, and 5) for each batch of wood that is treated during each creosote treatment process? If not please explain.

      Response No. Condensate is generated during the boultonization process, which is utilized only during creosote treatment of green wood.

   b. How often is condensate generated by the facility (daily, weekly, monthly, etc.)?

      Response Condensate is generated daily.

   c. Does the facility maintain records that document the amount of condensate generated by each treatment cylinder (Cylinder Nos. 1, 2, 3, and 5) for each batch of wood that is treated?

      Response No

   d. State whether a "waste determination" and "LDR determination has been made for the condensate.

      Response No, neither determination is required since the condensate is exempt from classification as a regulated "solid waste" pursuant to 40 CFR §261.4(a)(9) as further explained in Attachment A hereto.

   e. If a "waste determination" and "LDR determination" have been made for the condensate, state when such determinations were made.

      Response Not applicable, see 1.d.

   f. Was the condensate determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous.

      Response Not applicable; see 1.d.

   g. State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the material, or on analytical results.

      Response Not applicable; see 1.d.

h. Has the facility ever collected samples of the condensate for analysis? If so, please provide such analytical results for each and every sample of condensate ever collected and analyzed.

Response No; see 1.d.

i. Has the average volatile organic (VO) concentration of the condensate at the point of waste origination been determined as required by 40 C.F.R. 265.1084 (a)(1)? If so, submit any and all records/documents related to the VO concentration determination for the condensate.

Response Not applicable; see 1.d.; 40 CFR §264.1084 is not applicable to materials which are not "solid wastes"

j. For the waste determination that is required by 40 C.F.R. 265.1084 (a)(1), state whether the determination was based on direct measurement as specified in 40 C.F.R. 265.1084 (a)(3) or by knowledge as specified in 40 C.F.R. 265.1084 (a)(4). If the waste determination was based on knowledge, please submit any and all records/documents related to such VO concentration determination as required by 40 C.F.R. 265.1084 (a)(4)(i).

Response Not applicable; see 1.d.; 40 CFR §264.1084 is not applicable to materials which are not "solid wastes"

k. State the average VO concentration, in parts per million (ppm), of this waste stream at the point of waste origination.

Response Not applicable; see 1.d.; 40 CFR §264.1084 is not applicable to materials which are not "solid wastes"

2. With regard to the "work tank" used to collect condensate generated during the creosote treatment process, please answer the following.

a. Please state in specific detail the purpose of the "work tank" which is used to collect condensate generated during the creosote treatment process.

Response The work tank is used to collect condensate generated from the boultonization process for green wood prior to the transfer of such condensate for recycling/ reuse into the production process as provided by 40 CFR §261.4(a)(9).

b. Is there a "work tank" for each of the Facility four creosote treatment cylinders?

Response Yes

c. Please state the volumetric size for each "work tank" at the Facility and the treatment cylinder associated with each "work tank."

Response

Cylinder #1	23,300 gal.	Work Tank #1	1225 gal.
Cylinder #2	13,250 gal.	Work Tank #2	1225 gal
Cylinder #3	20,150 gal.	Work Tank #3	1762 gal.
Cylinder #5	13,800 gal.	Work Tank #5	1225 gal.

d. Please provide the date each "work tank" was installed at the Facility and submit any supporting documentation the Facility has related to such installation?

Response Work Tank #1 installed in 1994.
Work Tank #2 installed in 1993
Work Tank #3 installed in 1992
Work Tank #5 installed in 1999

e. Please state the date condensate was first put into each "work tank?"

Response Work tank #1 in 1994
Work tank #2 in 1993
Work tank #3 in 1992
Work tank #5 in 1999

f. Was there a tank assessment performed to determine the integrity of each tank system before condensate was first collected in each "work tank?" If so, please provide a copy of the written assessment, reviewed and certified by an independent qualified registered professional engineer attesting that each "work tank" system had sufficient structural integrity.

Response Each work tank has a National Board Number. "National Board" means the National Board of Boiler and Pressure Vessel Inspectors, 1055 Crupper Avenue, Columbus, OH 43229, whose membership is composed of the chief inspectors of government jurisdictions who are charged with the enforcement of the provisions of the ASME Code.

National Board Numbers:
#1 – 1246
#2 – 1227
#3 – 96
#5 – 1316

Each work tank is routinely inspected for integrity by BPB and inspected by the Commonwealth of Virginia each year for compliance with the Boiler and Pressure Vessel Safety Act, Chapter 3.1 (§40.1-51.5 et seq of Title 40.1) of the Code of Virginia. **See Attachment B**

g. Provide information/documentation demonstrating that each "work tank" **is** or **is not** exempt from air emission standards for hazardous waste tanks as specified in §40 C.F.R. 265.1083(c)(1).

Response None of 40 CFR Part 265 is applicable since the material collected in the work tank is exempt from being a "solid waste" pursuant to 40 CFR §261.4(a)(9) as discussed in Attachment A hereto.

h. Is secondary containment meeting the requirements of 40 C.F.R. 265.193(d) provided for each "work tank?" If so, please provide a detail description of the type of secondary containment utilized and the installation date of such secondary containment.

Response None of 40 CFR Part 265 is applicable since the material collected in the work tank is exempt from being a "solid waste" pursuant to 40 CFR§ 261.4(a)(9) as discussed in Attachment A hereto. For general information purposes, each work tank is located inside the treating building which is constructed of a concrete floor with walls on three sides and a curb on the other. The floor is sloped to the pit area so that any spill will be contained within the building.

i. Is each "work tank" inspected at least once each operating day in accordance with 40 C.F.R. 265.195? If so, please submit inspection logs for each "work tank" for the time period of January 1, 2000 up to receipt of this letter.

Response None of 40 CFR Part 265 is applicable since the material collected in the work tank is exempt from being a "solid waste" pursuant to 40 CFR §261.4(a) (9) as discussed in Attachment A hereto. Each work tank is, in accordance with §261.4(a)(9)(iii)(C), subject to visual inspection each day; no formal inspection logs are maintained.

j. Following collection of the condensate in the "work tank," please state the type of unit(s)(i.e., oil/water separator, evaporator, etc.) the condensate is directed to for further management by the Facility

k. Please state how (i.e., pumped/gravity fed through hard-piping) the condensate is transferred to each such unit, provided in response to Question 2.j.

Response j & k Air pressure is used to transfer the condensate through hard piping from the work tank to evaporator, also referred to as a "retort".

3. With respect to the "evaporator" used by the Facility to manage condensate generated during the creosote treatment process, please answer the following:

   a. Please state in specific detail the purpose of the "evaporator" which is used to manage condensate generated during the creosote treatment process.

      Response The evaporator reduces a portion of the water content of the condensate reclaiming a creosote/water wood treating solution which is then returned to the creosote product storage tank for reuse in the production process in substantially its original form, in accord with the general purpose of the 40 CFR §260.31 and specific purpose of 40 CFR §261.4(a)(9)

   b. State the type of "evaporator" used by the Facility and provide the manufacturer, make, and model information for such evaporator. In addition, please submit any other information/specification the Facility has regarding such "evaporator".

      Response The evaporator is manufactured from a ½" thick x 7' dia. x 19' tall steel tank, preventing any releases of product being reclaimed to either the soil or groundwater as provided by 40 CFR §261.4(a)(9)(iii)(B). Steam coils are used as the heating agent to evaporate excess water from the condensate.

   c. State the date on which the "evaporator" was installed at the Facility. Pleases submit any and all records/documentation regarding such installation that have been retained by the owner or operator of the facility.
   d. Please state the date the "evaporator" was first used at the Facility and the basis of your knowledge.

      Response c &d. The evaporator was installed and put into service in 1997.

   e. How often (i.e., daily, weekly, monthly) is the "evaporator" operated?

      Response The evaporator is operated daily.

   f. Does the Facility maintain records that document how often the "evaporator" is operated? If so, please submit any and all such records/documentation retained by the owner or operator of the Facility for the period of January 1, 2000 up to receipt of this letter.

      Response No.

g. Please provide a detail description of how the "evaporator" is heated (i.e., electric, circular gas through pipes, open flame, etc.)

Response The evaporator is heated by steam coils located inside the evaporator

h. Does the "evaporator use direct or indirect heat source?

Response The steam coils would be an indirect heat source.

i. Please state the temperature the condensate is heated to by the "evaporator."

Response 212 degrees.

j. Has any material ever been removed from the "evaporator" at any time during the time period of January 1, 2000 up to receipt of this letter? If so, please answer the following:

i. Please state how material was removed from "evaporator."

Response: The reclaimed creosote/water wood treating product from the evaporator is returned via hard pipe to the creosote product storage tanks to be used as an effective substitute for "virgin" creosote . This transfer via piping prevents releases to the soil or groundwater.

ii. Please provided a detail description of how the material was managed by the Facility once it was removed from the "evaporator."

Response: The reclaimed creosote/ water wood treating product from the evaporator is returned via hard pipe to the creosote product storage tanks to be used as an effective substitute for "virgin" creosote . This transfer via piping prevents releases to the soil or groundwater

iii. State whether a "waste determination" and "LDR determination" was made for the material.

Response: The reclaimed wood preserving solution and wastewater is an effective substitute for "virgin" creosote and specifically exempt from classification as a "solid waste" pursuant to 40 CFR §261.4(a)(9)

iv. If a "waste determination" and "LDR determination" were made for the material, state when such determination were made.

v. Was the material determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.

vi. State whether the hazardous waste determination was based on the generator's knowledge of the process that generated the material, or on analytical results. If the determination was based on analytical results, provide any and all such results.

vii. Was the material shipped off-site for recycle (i.e., reclaim, re-use), treatment, storage, or disposal?

viii. If the material was shipped off-site, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certification that accompanied the off-site shipment of this material.

Response iv-viii Response: The reclaimed wood preserving solution and wastewater is an effective substitute for "virgin" creosote and specifically exempt from classification as a "solid waste" pursuant to 40 CFR §261.4(a)(9)

4. With regard to the ancillary equipment associated with each "work tank" and the "evaporator," please answer the following:

   a. Describe in detail the purpose of the ancillary equipment attached to each "work tank" and the evaporator."

   b. Provide a detailed list of all equipment, as defined in 40 C.F.R. 264.1031, associated with each "work tank" and the "evaporator."

   Response a. & b A condenser is directly hard piped with control valves to the creosote treatment cylinders (more commonly referred to as "autoclaves") The condenser is hard piped with associated control valves to the work tank which collects the condensate. The work tank is hard piped with associated valves and compressed air from an air compressor is used to transfer the condensate to the "evaporator" or retort where excess water is evaporated from the condensate; finally the reclaimed creosote/water wood treating product is hard piped with valves from the evaporator to the original process as an effective substitute for "virgin" creosote. All points of the process are designed to present release to either the soils or groundwater in accord with the requirements of 40 CFR §261.4(a)(4). 40 CFR. §264.1031 is not applicable since the material is not a solid waste.

   c. Provide information/documentation demonstrating that the ancillary equipment associated with each "work tank" and the "evaporator" is or is not exempt from air emission standards for equipment leaks as specified in 40 C.F.R. 265.1050.

   Response Since none of the material is a "solid waste", none of the primary nor ancillary equipment is subject to 40 CFR §265.1050.

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: Doug Gentry

Doug Gentry
Division Manager
Burke-Parsons-Bowlby Corporation

ATTACHMENT A

ATTACHMENT A

EXCLUSION FROM THE DEFINITION OF SOLID WASTE FOR WOOD TREATING WASTE WATERS AND SPENT WOOD PRESERVING SOLUTIONS APPLICABLE TO BPB GOSHEN, VIRGINIA FACILITY

The U.S. EPA RCRA regulation at § 261.4(a)(9) excludes from the definition of "solid waste", spent wood preserving solution/waste waters from the boultonization process which are reclaimed to reduce H20 content by evaporation in a retort (referred to by EPA as an "evaporation" tank) and then reused back into the original wood treating process as an effective substitute for "virgin" creosote. Therefore, both the reclaimed materials and the process is exempt from classification as hazardous waste management:

§261.4 (a) Materials which are not solid wastes. The following materials are not solid wastes for the purpose of this part . . .

(9)(i) Spent wood preserving solutions that have been reclaimed and are reused for their original intended purpose; and

(ii) Wastewaters from the wood preserving process that have been reclaimed and are reused to treat wood.

(iii) Prior to reuse, the wood preserving wastewaters and spent wood preserving solutions described in paragraphs (a)(9)(i) and (a)(9)(ii) of this section, so long as they meet all of the following conditions:

(A) The wood preserving wastewaters and spent wood preserving solutions are reused on-site at water borne plants in the production process for their original intended purpose;

(B) Prior to reuse, the wastewaters and spent wood preserving solutions are managed to prevent release to either land or groundwater or both;

(C) Any unit used to manage wastewaters and/or spent wood preserving solutions prior to reuse can be visually or otherwise determined to prevent such releases;

(D) Any drip pad used to manage the wastewaters and/or spent wood preserving solutions prior to reuse complies with the standards in part 265, subpart W of this chapter, regardless of whether the plant generates a total of less than 100 kg/month of hazardous waste; and

(E) Prior to operating pursuant to this exclusion, the plant owner or operator submits to the appropriate Regional Administrator or State Director a one-time notification stating that the plant intends to claim the exclusion, giving the date on which the plant intends to begin operating under the exclusion, and containing the following language: "I have read the applicable regulation establishing an exclusion for wood preserving wastewaters and spent wood preserving solutions and understand it

requires me to comply at all times with the conditions set out in the regulation." The plant must maintain a copy of that document in its on-site records for a period of no less than 3 years from the date specified in the notice. The exclusion applies only so long as the plant meets all of the conditions. If the plant goes out of compliance with any condition, it may apply to the appropriate Regional Administrator or State Director for reinstatement. The Regional Administrator or State Director may reinstate the exclusion upon finding that the plant has returned to compliance with all conditions and that violations are not likely to recur.

The following discusses each of the foregoing conditions of 40 CFR §261.4(a)(9)(iii) in the context of the BPB boultonization process waste waters/spent wood preserving solutions and reclamation in the retort (evaporation tank). Clarification regarding the applicability of the provisions is taken from the May 12, 1997 preamble to the proposed rule (62 FR 26041 et seq.) and the May 26, 1998 preamble to the final rule (63 FR 28555 @28629 et seq :

§ 261.4(a)(9)(iii)(A) – Reused on site at waterborne plants and utilized in the production f process for originally intended purpose :

The exclusion applies to wood preserving wastewaters and spent wood preserving solutions used on site at waterborne plants–not to oil borne plants. BPB reclaims and reuses the wood preserving wastewaters and spent wood preserving solution from the boultonization process directly on site within the process area and BPB is a waterborne plant. Although not explicit in the rule, according to the rule preamble , the exclusion is intended for a Clean Water Act "zero discharge" facilities. BPB is also a zero discharge facility has relatively small volumes of wastewater and is a zero discharge facility:

.

It is our understanding that reuse of wastewaters and spent wood preserving solutions is standard practice at waterborne plants, which are subject to zero discharge requirements under the federal Clean Water Act and, therefore, those plants meet the criteria set out in Sec. 260.31(b)(2). 62 FR 26041 at 26057

BPB recycles and reuses the waste water and spent wood preserving solution from the boultonization process directly within the wood treating process area , mixing the recovered product in with virgin product for direct reuse into the wood treating process. EPA's § 261.4(a)(9)(iii) conforms to the requirements of the general exemption of § 260.31(b)(1) for materials which are reclaimed and then reused as feedstock within the original production process. The "feedstock" for wood preserving is the wood preserving solution.

The exemption of 40 CFR 264.1(a)(9) specifically envisions that the wastewaters and spent wood preserving solutions would be reclaimed prior to their reuse.

BPB effects reclamation concentrating the wastewaters/ spent wood preserving solution by evaporating excess H_20 and utilizing the resultant wood treating solution directly as an effective substitute for virgin wood treating preservative consistent with EPA's discussion of the regulatory exclusion in §264.1(a)(9):

> *. Without recycling their wastewater and preservative, wood preserving plants would have to purchase fresh water and preservative and pay for their disposal. It is our understanding that reuse of wastewaters and spent wood preserving solutions is standard practice at waterborne plants, which are subject to zero discharge[[Page 26057]]*
> *requirements under the federal Clean Water Act and therefore, those plants meet the criteria set out in Sec. 260.31(b)(2). The condition that these materials be recycled and reused on-site virtually assures close proximity of the recycling operation to the primary production process (Sec. 260.31(b)(5)) and that the materials are generated and reclaimed by the same party (Sec. 260.31(b)(7)). In its letter, AWPI stated that "in both oilborne and waterborne processes, the reclamation operation is located within, and is an integral component of, the production process area." We are also proposing that the exclusion for wastewaters and spent wood preserving solutions being reclaimed be conditioned on the reclaimed materials being used for their original intended purpose when returned to the production process (Sec. 260.31(b)(6)). It is EPA's understanding (and is stated by AWPI in their letter) that the reused materials, once reclaimed, are returned to the process in substantially their original form (Sec. 260.31(b)(6)), and that the short amount of time . EPA believes that the industry also meets Sec. 260.31(b)(4) criteria concerning the amount of time between generation and reclamation and reclamation and return to the primary production process Sec. 260.31(b)(4)) supports finding that reclamation is an essential part of the production process.* 62 FR 26041 @26056-26057

The preamble to the final rule broadly defines units which are potentially subject to the exclusion if all conditions are met:

> *EPA will now clarify which 'units' are subject to inspection under the conditions of this exclusion. As mentioned above, all units that come into contact with the excluded materials prior to reclamation must necessarily be subject to verification that they are able to contain these materials in a manner that prevents their release to the environment. This includes, but is not necessarily limited to, any drip pad, sump, retort or conduit that comes into contact with the wastewaters and spent solutions prior to reclamation. This also includes any unit that is arguably part of a plant's*

wastewater treatment system but that comes into contact with the wastewaters or spent solutions prior to reclamation. (63 FR 28555 @28629).

A "retort" is not defined in the regulations or explained in the preamble; however, a "retort" is commonly defined as a vessel used for distillation of substances placed inside and subjected to heat:
Webster's Unabridged Dictionary: *"a device used for distillation, sublimation or decomposition by heat: "retort" n. Etymology: Middle French retorte, from Medieval Latin retorta, from Latin, feminine of retortus; from its shape : a vessel or chamber in which substances are distilled or decomposed by heat*

Encyclopedia Britannica:
vessel used for distillation of substances that are placed inside and subjected to heat

§ 261.4(a)(9)(iii)(B) - Waste waters Managed to Prevent Release to Either Land or Groundwater or Both

The regulation limits releases from the reclamation process to land or groundwater. In this regard, the language of § 261.4(a)(9)(iii)(B) is in contrast to the language of the general recycling exemption of § 261.4(a)(8) for secondary materials. Pursuant to § 261.4(a)(8), secondary materials or "wastes," which are reclaimed and returned to the original process in which they were generated and which are reused in the production process, are exempt from being classified as a hazardous waste provided that only tank storage is involved and the entire process through the completion of reclamation is closed by being entirely connected with pipes or other comparable enclosed means of conveyance.

Comparing the language of § 261.4(a)(9)(iii)(B) with the general recycling exemption of § 261.4(a)(8) for secondary materials clarifies that the wood treating exemption of § 261.4(a)(9)(iii) was intended specifically to be broader than the general secondary material reclamation exemption of § 261.4(a)(8), prohibiting only releases to the land or water.

b. Materials are Managed to Prevent Release. The exclusion EPA is proposing today would only apply to those materials that are managed to prevent releases to the land and groundwater. This condition is to assure that any plant claiming this exclusion is adequately handling its recyclable wastewaters and spent wood preserving solutions to minimize loss prior to reclamation. Based on our experience, management to prevent releases would include, but not necessarily be limited [[Page 26058]] to, compliance with the standards for drip pads under Subpart W of 40 CFR Parts 264 and 265 and maintenance of the sumps receiving the wastewaters and spent solutions from the drip pad and retort to prevent leaching into the land and groundwater. 62 FR 26041 @26057-26058

§ 261.4(a)(9)(iii)(C) - Unit Managing Waste Waters Visually Determined to Prevent Releases.

This provision is ancillary to § 261.4(a)(9)(iii)(B) . In the BPB process all units and ancillary piping and equipment from the recovery of condensate from the autoclaves to return of the reclaimed wood preserving medium to the product tanks may be visually inspected to assure there are no releases to land or water.

§ 261.4(a)(9)(iii)(D) - Drip Pads Comply with §265, Subpart W Standards

This portion of the standard is not relevant to the reclamation /reuse of wood treating wastewaters and spent wood preserving solutions from the autoclaves. The 261.4(a)(9)exemption also allows that collected wastewaters from the drip pad may be managed via reclamation and reuse as product and exempted from being a "solid waste" . Therefore subsection (iii)(c) of the exclusion is relative to the proper design and operation of drip pads

§ 261.4(a)(9)(iii)(E) - Notification that BPB Intends to Utilize the Exemption

BPB filed the requisite notification, attached hereto with the U.S.EPA Region III. **See Attachment C.**

CONCLUSION:

In conclusion BPB has fulfilled all of the requirements for the applicability of the 261.4(a)(9) exemption and none of the process or product is regulated hazardous waste management.

ATTACHMENT B

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF LABOR AND INDUSTRY
BOILER SAFETY COMPLIANCE PROGRAM
CERTIFICATE OF INSPECTION

Date of Insp 10/10/2003

Expires 10/10/2005

Location Treatment

This certifies that the equipment described herein has been inspected and may be operated at the designated location at a pressure not to exceed that shown.

Type Equipment	VA Number	NB Number	Year Built	Manufacturer
Unfired Pressure Vessel	VA102900	00001246	1994	Capital City

Allowable Pressure	Safety Valve Set	Inspection Company
200	200	Cincinnati Insurance Company

Burke Parsons-Bowlby Corp
PO Box 86
Goshen, VA 24439-0086

Object Located At:
Burke Parsons-Bowlby Corp
9223 Maury River Rd
Goshen, VA 24439

Post this certificate in a conspicuous and protected place near the equipment. May be revoked for failure to keep equipment in safe condition or nonpayment of certificate fee.
953975459

C. Ray Davenport
Commissioner

Work tank # 1

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF LABOR AND INDUSTRY
BOILER SAFETY COMPLIANCE PROGRAM
CERTIFICATE OF INSPECTION

Date of Insp 10/10/2003

Expires 10/10/2005

Location Treatment

This certifies that the equipment described herein has been inspected and may be operated at the designated location at a pressure not to exceed that shown.

Type Equipment	VA Number	NB Number	Year Built	Manufacturer
Hydro-Pneumatic Tank	VA105339	00001227	1993	Capital City

Allowable Pressure	Safety Valve Set	Inspection Company
200	200	Cincinnati Insurance Company

Burke Parsons-Bowlby Corp
PO Box 86
Goshen, VA 24439-0086

Object Located At:
Burke Parsons-Bowlby Corp
9223 Maury River Rd
Goshen, VA 24439

Post this certificate in a conspicuous and protected place near the equipment. May be revoked for failure to keep equipment in safe condition or nonpayment of certificate fee.
953975459

C. Ray Davenport
Commissioner

Work tank # 2

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF LABOR AND INDUSTRY
BOILER SAFETY COMPLIANCE PROGRAM
CERTIFICATE OF INSPECTION

Date of Insp 10/10/2003

Location Treatment

Expires 10/10/2005

This certifies that the equipment described herein has been inspected and may be operated at the designated location at a pressure not to exceed that shown.

Type Equipment	VA Number	NB Number	Year Built	Manufacturer
Unfired Pressure Vessel	VA106974	00000096	1987	Kerr's

Allowable Pressure	Safety Valve Set	Inspection Company
200	200	Cincinnati Insurance Company

Burke Parsons-Bowlby Corp
PO Box 86
Goshen, VA 24439-0086

Object Located At:
Burke Parsons-Bowlby Corp
9223 Maury River Rd
Goshen, VA 24439

Post this certificate in a conspicuous and protected place near the equipment. May be revoked for failure to keep equipment in safe condition or nonpayment of certificate fee.
953975459

C. Ray Davenport
Commissioner

Work tank # 3

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF LABOR AND INDUSTRY
BOILER SAFETY COMPLIANCE PROGRAM
CERTIFICATE OF INSPECTION

Date of Insp 10/10/2003

Location Treatment Plt.

Expires 10/10/2005

This certifies that the equipment described herein has been inspected and may be operated at the designated location at a pressure not to exceed that shown.

Type Equipment	VA Number	NB Number	Year Built	Manufacturer
Unfired Pressure Vessel	VA130524	00001316	1999	Capital City

Allowable Pressure	Safety Valve Set	Inspection Company
200	200	Cincinnati Insurance Company

Burke Parsons-Bowlby Corp
PO Box 86
Goshen, VA 24439-0086

Object Located At:
Burke Parsons-Bowlby Corp
9223 Maury River Rd
Goshen, VA 24439

Post this certificate in a conspicuous and protected place near the equipment. May be revoked for failure to keep equipment in safe condition or nonpayment of certificate fee.
953975459

C. Ray Davenport
Commissioner

Work tank # 5

ATTACHMENT C

APPALACHIAN DIVISION

The BURKE-PARSONS-BOWLBY Corporation

P. O. BOX 86 • GOSHEN, VIRGINIA 24439 • PHONE (540) 997-9251 • FAX (540) 997-0047

PRESSURE TREATED
WOOD PRODUCTS

July 27, 2001

Regional Administrator
Region 3
U.S. Environmental Protection Agency
841 Chestnut Building
1650 Arch Street
Philadelphia, PA 19103

Dear Administrator:

Burke-Parsons-Bowlby Corporation (BPB) is providing pursuant to 40 CFR s 261.4 (a) (9) (iii) notification that its wood preserving plant at 9223 Maury River Road, Goshen, Virginia 24439-0086 is claiming that since 1998 the plant has been and will continue to be operating pursuant to the exclusion in 40 CFR s 261.4 (a) (9) (iii).

I have read the regulation establishing an exclusion for wood preserving wastes water and spent wood preserving solutions and understand that it requires BPB to comply at all times with the conditions set out in the regulation.

A copy of this document will be maintained with the records at the Goshen, Virginia plant for a period of no less than three years from this date.

Sincerely,

Doug Gentry
Division Manager
Goshen Division

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7099 3400 0014 8788 1175

Postage	$ 1.34
Certified Fee	2.10
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	1.50
Total Postage & Fees	$ 3.94

GOSHEN VA JUL 0 2001 USPS 24439 Postmark Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)
Regional Administrator - US Envir. Prot. Agency
Street, Apt. No.; or PO Box No.
841 Chestnut Bldg, 1650 Arch Street
City, State, ZIP+4
Philadelphia PA 19103

PS Form 3800, February 2000 — See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Regional Administrator RA00
Region 3
US Environmental Protection Agency
841 Chestnut Building
1650 Arch Street
Philadelphia, PA. 19103

2.

PS

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* — B. Date of Delivery
ENVIRONMENTAL PROTECTION 1650 Arch Street Philadelphia, PA 19103-2029 — AUG 0 1 2001

C. Signature
X
☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

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